

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
JAN 25 2010

UNITED STATES DISTRICT COURT

DISTRICT OF WYOMING

Stephan Harris, Clerk
Cheyenne

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

PETER JASON HUMPHRIES

CASE NUMBER:

10-mj-14-D

I, Cathleen Trujillo, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about and between the dates of October 14, 2009, and January 22, 2010, in Laramie County, in the District of Wyoming, the Defendant, **PETER JASON HUMPHRIES**, using a means of interstate commerce, namely the Internet, did knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activity for which an individual could be charged with a criminal offense, to wit: the Defendant, **PETER JASON HUMPHRIES**, engaged in a series of online chats with a person he thought was a fourteen year old female wherein he attempted to persuade the fourteen year old female to engage in sexual acts, such as oral copulation, with him,

in violation of Title **18** United States Code, Section 2422(b).

I further state that I am a Special Agent with the Wyoming Attorney General's Office, Division of Criminal Investigation, and that this complaint is based on the following facts:

1. Your Complainant, Cathleen Trujillo, is a Cheyenne Wyoming Police Officer currently assigned to the Wyoming Internet Crimes Against Children Task Force (ICAC). I have been employed as a police officer with the Cheyenne Police Department since 1994 and was assigned to the Wyoming ICAC task force in November 2009.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Cathleen Trujillo

Signature of Complainant

CATHLEEN TRUJILLO

Sworn to before me and subscribed in my presence,

JANUARY 25, 2010

at

CHEYENNE, WYOMING

Date

City and State

HON. ALAN B. JOHNSON

United States District Court Judge

Name & Title of Judicial Officer

Alan B. Johnson

Signature of Judicial Officer

**CONTINUED SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT
PETER JASON HUMPHRIES**

2. Your Complainant has completed over 2000 hours of certified law enforcement training to include the investigation of crimes involving child exploitation. As stated above, since November 2009, your Complainant has been a part of the Wyoming Internet Crimes Against Children (ICAC) task force in Cheyenne, Wyoming. The Wyoming ICAC task force is a cooperative effort consisting of members from the Wyoming Division of Criminal Investigation (DCI), the United States Immigration and Customs Enforcement - Cheyenne office, the Federal Bureau of Investigation (FBI), and the Cheyenne Police Department, whose purpose is to investigate criminal violations of both federal and state child exploitation laws. Your Complainant has received training in the investigation of technology facilitated child exploitation cases.

3. This sworn statement is based partly upon information your Complainant has gained from speaking to Parker, Colorado Police Department Investigator Penny VanDenBerg and partly upon knowledge gained first hand. Since this sworn statement is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your Complainant has not included each and every fact known to her concerning this investigation. Your Complainant has set forth only the facts that she believes are necessary to establish probable cause to believe that **PETER JASON HUMPHRIES** used the Internet in an attempt to persuade, induce, and entice an individual who he believed had not attained the age of 18 years to engage in sexual activity for which an individual

could be charged with a criminal offense in violation of Title 18, United States Code, Section § 2422(b).

4. Your Complainant knows, based upon training and experience, that chat rooms on Yahoo! are frequently used by adults who are attempting to locate and arrange to have sexual contact with children.

5. Your Complainant was informed by Detective Penny VanDenBerg, who is an investigator with the Parker Colorado Police Department assigned to work crimes against children cases, that on and between October 14, 2009, and January 22, 2010, she had a number of online chats with person using the online screen name of "thunder Larsen." During these chats Detective VanDenBerg assumed the online persona of a 14 year old girl. According to Detective VanDenBerg the first such online chat took place on October 14, 2009, at approximately 5:58 p.m., when she was in a Yahoo! chat room. According to VanDenBerg she was sent an instant message by an individual using the screen name "thunder Larsen." Within two minutes of the initial contact "thunder Larson," told the undercover persona he was 36 years of age and VanDenBerg told "thunder Larsen" that she was 14. During the ensuing online chat conversation the online persona was asked by "thunder Larsen" if she wanted to play "the question game." He explained that each person asks questions back and forth and they answer them. Through this question game "thunder Larsen" stated he coached 8-9 year old football; had two girls ages 10 and 12; was married; lived in Cheyenne, Wyoming; and drove a minivan and a Suzuki motorcycle. "Thunder Larsen" also asked sexual questions such as: what size her "tits" were; if she was a virgin; did she engage in masturbation; told

the 14 year old girl he wanted to see her naked on her web cam; asked if she had ever seen pornography; asked if she would “suck” his “cock;” and said “would you want me to eat your pussy.”

6. Your Complainant was further informed by Detective VanDenBerg that on October 14, 2009, “thunder Larsen” sent Detective VanDenBerg an email with a photo of himself from a cell phone. The email stated it came from “jasonhumphries68521@yahoo.com.” Within that message was a digital image of an adult male that “thunder Larsen” represented to be of himself. When Detective VanDenBerg opened the email it reflected that it was sent from a cellular telephone with the number displayed and sent by jasonhumphries68521@yahoo.com.

7. Your Complainant was further informed by Detective VanDenBerg that she, VanDenBerg, using the information from the image she was sent by “thunder Larsen” was able to determine that the individual who had sent her the image and who used the online screen name of “thunder Larsen” was **PETER JASON HUMPHRIES** of Cheyenne, Wyoming.

8. Your Complainant was informed by Detective VanDenBerg that she had an online chat, using her online persona of a 14 year old girl, with “thunder Larsen” on January 6, 2010. During this chat “thunder Larsen” stated he was chatting with Detective VanDenBerg from his phone while at work and asked if she would be online the following Wednesday so she could show herself to him. She asked him specifically what he wanted to see and he said, “Can I see ur titties?...Can I see ur pussy?” He then asked if she thought if they would ever meet and if there were motels close to her house. He stated, “So maybe this summer I could come down and get a room and u could

walk over there.” He suggested during this meet that they could make out, get naked, and he would teach her how to give a “blow job.” He then asked if she would want to have sex with him. He proceeded to direct her in touching herself in a sexual manner and he stated he was in the bathroom at work and “came” in a rag.

9. Your Complainant was informed by Detective VanDenBerg that during several of her online chats with “thunder Larsen” he made comments about how it was illegal for him to be chatting with a 14 year old girl, and once stated, “if I get caught im busted.” On another occasion he stated, “U should find out what the leagl age of consent is in colorado.” When asked why he said, “Statutory rape!”

10. Based upon the investigation of Detective VanDenBerg, on January 22, 2010, your Complainant was able to obtain a state search warrant for the residence of **PETER JASON HUMPHRIES**, located in Cheyenne, Wyoming. On January 22, 2010, your Complainant, with the assistance of Detective VanDenBerg and other members of the Wyoming ICAC task force and Parker Police Department investigators executed the search warrant. During the execution of the search warrant **PETER JASON HUMPHRIES** was at his residence. Detective VanDenBerg identified **HUMPHRIES** as the same person who was depicted in the digital images sent to her by “thunder Larsen” on October 14, 2009, as set forth in paragraph 6 above.

11. Your Complainant was informed by Detective VanDenBerg that she interviewed **PETER JASON HUMPHRIES** on January 22, 2010. According to VanDenBerg **HUMPHRIES**

admitted he used the online screen name of “thunder Larson” and that he had been online, chatting with a 14 year old girl from Colorado. Further, **HUMPHRIES** admitted he had asked the 14 year old girl to engage in illegal sexual activity during their online chats.

End of Sworn Statement

PENALTY SUMMARY

Complaint

DATE: January 25, 2010

DEFENDANT NAME: PETER JASON HUMPHRIES

Victim: NO

OFFENSE AND PENALTY:

OFFENSE: 18 U.S.C. § 2422(b)
(Attempting to Entice a Minor to Engage in Illegal Sexual Activity)

PENALTY: NLT 10 YEARS OR MORE THAN A TERM OF LIFE
IMPRISONMENT
\$250,000.00 FINE
NLT 5 YEARS OR MORE THAN A TERM OF LIFE
SUPERVISED RELEASE
\$100 SPECIAL ASSESSMENT

AGENT: Cathleen Trujillo- DCI

AUSA: James C. Anderson

ESTIMATED TIME OF TRIAL:

INTERPRETER NEEDED:

☒ five days or less
☐ over five days
☐ other

☐ Yes
☒ No

THE GOVERNMENT:

☒ will
☐ will not

☐ The court should not grant bond
because the defendant is not bondable
because there are detainers from other
jurisdictions

**SEEK DETENTION IN THIS
CASE.**